UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	24-CR-50081
	)	
Plaintiff,	)	
	)	
v.	)	
	)	**MOTION FOR CONTINUANCE**
CHARLES MAUDE and	)	
HEATHER MAUDE,	)	
	)	
Defendants.	)	
	)	

COMES NOW, Defendant, Heather Maude, by and through her attorney, Justin L. Bell of May, Adam, Gerdes & Thompson LLP, and moves the Court for an Order extending the trial setting of January 28, 2025, and all related pretrial deadlines by at least 90 days.

As grounds, Defendant states:

1. Defendant made her initial appearance and was arraigned on July 8, 2024, on an Indictment charging the Defendant with Theft of Government Property.

2. Defense counsel has advised the Defendant of this motion, its purpose, and her constitutional and statutory right to a speedy trial, pursuant to 18 U.S.C. § 3161 *et seq.* Defense counsel will file a written informed consent to the continuance from the Defendant when received.

3. Defendant is currently released on her own recognizance.

4. The United States of America, by and through Assistant US Benjamin Patterson, has informed defense counsel that this motion is not opposed.

5. The undersigned, further, represents to the Court that this motion is made neither for purposes of undue delay nor other improper reason. Counsel makes this request for the

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Defendant in order to have the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

WHEREFORE, Defendant requests that the Court continue the trial setting a date for at least 90 days (a trial beginning on or after April 28, 2025), and further, that the suppression motion, voluntariness motion, and all related pretrial deadlines be continued.

Dated this 6th day of January, 2024.

MAY, ADAM, GERDES & THOMPSON LLP

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